

database management system manages multimedia assets such as images (scanned photographs or computer-generated images), video (created by videography equipment or computer animation), audio, text, program code, etc. See Rose, Col. 1 line 65 - Col. 2 line 2. The database structure that Rose employs, however, allocates different data structures for each of these assets. Moreover, each of the assets, images, video, audio, object, docs, and general, of Rose is stored and referenced only through the data structure that is specific to that asset type. See Rose, Col. 5 line 8 - Col. 12, line 53; and FIGURE 3. Thus, for example, an image asset has a distinct data structure that is different from a video asset, or an audio asset, and so forth. Compare for example, the data structures described at Col. 10, lines 39-54 for an image asset to a data structure described at Col. 11 lines 1-20, for a video asset. Note in particular that the image asset data structure described by Rose is employed **only** for images, such as BMP, GIF, PCX, and other files. See Rose, Col. 10 lines 55-59. The image asset data structure does not reference, for example, audio assets, executable code, video assets, or the like. Instead, each of Rose's data structures is unique and distinct and **most important is not** designed to, nor does it, reference the other assets types. Thus, it is clear that Rose does not teach or suggest **each data object** in the data store being referenced in each of the plurality of data structure types. Nor does Rose teach making such references separately and in parallel, as is claimed by the Applicants.

Furthermore, because Rose does not teach or suggest referencing each data object in each of the of the plurality of data structure types, Rose can not automatically determine one of the plurality of data structure types best suited to retrieve the one data object as described by the Applicants' invention. Rose can only employ the pre-selected singular data structure for any given one data asset. Rose makes no meaningful determination of a data structure type, as it is already predetermined. It makes no selection across the plurality of data structures. Thus, Rose does not make obvious the second element of Claim 1. Nor can Rose make obvious the third element of Claim 1, namely, "automatically determining another one of the plurality of data structure types best suited to the plurality of related data objects..." for at least the same reasons. Thus, for at least these reasons, Applicants respectfully submit that Rose does not render the claimed invention obvious. Moreover, while Primsch does describe deleting a stored object, Primsch does not provide teachings covering the above-identified elements missing from Rose.

In addition, because independent Claims 14, 17, 21-23, and 26 include similar limitations as Claim 1, albeit different, they are also allowable for at least substantially the same reasons as independent Claim 1.

In regard to Claims 2-13, 15-16, 18-20, 24-25, and 27 which are dependent on independent Claims 1, 14, 17, 23, and 26 respectively, they are allowable for at least the same reasons discussed above for those independent claims. Thus, in view of the foregoing remarks, reconsideration, and withdrawal of the rejection of the claims pending for examination is respectfully requested.

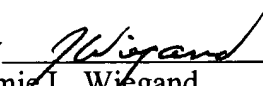
CONCLUSION

By the foregoing explanations, Applicants believe that this response has responded fully to all of the concerns expressed in the Office Action, and believes that it has placed each of the pending claims in condition for immediate allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. Should any further aspects of the application remain unresolved, the Examiner is invited to telephone applicant's attorney at the number listed below.

Dated: July 20, 2005

Respectfully submitted,

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